

1 ANTHONY L. MARTIN
2 Nevada Bar No. 8177
3 anthony.martin@ogletreedeakins.com
4 ERICA J. CHEE
5 Nevada Bar No. 12238
6 erica.chee@ogletreedeakins.com
7 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
8 Wells Fargo Tower
Suite 1500
3800 Howard Hughes Parkway
Las Vegas, NV 89169
Telephone: 702.369.6800
Fax: 702.369.6888

9 *Attorneys for Plaintiff*
10 *BrandSafway Services, LLC*

11
12 **UNITED STATES DISTRICT COURT**
13
14 **FOR THE DISTRICT OF NEVADA**

15 BRANDSAFWAY SERVICES, LLC,

16 Plaintiff,

17 vs.

18 LABORERS INTERNATIONAL UNION
19 OF NORTH AMERICA, LOCAL 169,

20 Defendants.

21 Case No.: 3:20-cv-00362-MMD-CLB

22
23 **STIPULATION AND ORDER FOR**
24 **EXTENSION OF TIME FOR PLAINTIFF'S**
25 **TO FILE OPPOSITION TO DEFENDANT'S**
26 **MOTION TO STAY AND MOTION TO**
27 **COMPEL ARBITRATION**

28 *(First Request)*

29 Pursuant to Rules LR IA 6-1, LR IA, 6-2, LR 7-1 and LR 7-2, Plaintiff BrandSafway
30 Services, LLC (“Plaintiff”) and Defendant Laborers International Union of North America, Local
31 169 (“Defendant”) by and through their respective undersigned counsel, hereby stipulate and agree
32 to their first request for a two-week extension of time, up to and including, **Thursday, September**
33 **10, 2020** for Plaintiff to respond to Defendant's Motion to Compel Arbitration (ECF No. 7) and
34 Motion to Stay the Case (ECF No. 8). The response to both motions are currently due Thursday,
35 August 27, 2020.

36 Good cause exists to extend the deadline for Plaintiff to file the opposition. Plaintiff's
37 counsel was in depositions on another matter the week of August 17 and Plaintiff's representative
38 with knowledge on the factual background of this matter was out of the office until the week of

1 August 24. As such, the parties stipulate to a two-week extension to afford Plaintiff additional time
2 to respond.

3 The stipulation is made in good faith and not for purposes of delay.

4 DATED this 24th day of August, 2020.

5 DATED this 24th day of August, 2020.

6 LAW OFFICES OF MICHAEL E. LANGTON

7 OGLETREE, DEAKINS, NASH, SMOAK &
8 STEWART, P.C.

9 */s/ Michael E. Langton*

10 */s/ Erica J. Chee*

11 Michael E. Langton
12 Nevada Bar No. 290
13 801 Riverside Drive
14 Reno, NV 89503
15 *Attorney for Defendant*

16 Anthony L. Martin
17 Nevada Bar No. 8177
18 Erica J. Chee
19 Nevada Bar No. 12238
20 Wells Fargo Tower
21 Suite 1500
22 3800 Howard Hughes Parkway
23 Las Vegas, NV 89169
24 *Attorneys for Plaintiff*

25 **IT IS SO ORDERED.**

26 **ORDER**



27 UNITED STATES DISTRICT JUDGE

28 *August 24, 2020*

29 DATED